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Leader Dogs for the Blind®

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January 4, 2005

Docket Clerk, Dept. of Transportation
400 7th St., SW, Room PL-401
Washington, DC 20590

Re: Service Animal Rules in NPRM on Air Travel for Persons With Disabilities

DOCKET # OST-2004-19482-22

On November 2, 2004, the Department of Transportation published a Notice of Proposed Rule Making in the Federal Register, regarding Service Animal Rules on Air Travel for Persons with Disabilities (Note referenced docket number). This has evoked significant concern and response by those involved in training and using assistance animals.

Leader Dogs for the Blind is particularly concerned with the deleterious consequences on our graduates who depend on the travel security and independence their guides provide. On numerous occasions, blind people and the agencies that train and support them have made the case, sometimes hard fought, to gain the right to keep their guide dog with them under all conditions.

This suggested policy change is fraught with ignorance and lack of understanding regarding the disabled individual's circumstances. To suggest that they pay for extra seating fails to recognize the economic situation that many disabled persons face. In effect, it may take away the opportunity for that person to travel simply because on increased cost. Separating the individual from their dog does not account for the dependency, and independence provided. Further, it does not recognize weather extremes or situations as most recently occurred with regard to lost luggage on several major US airlines.

It would appear that the issue is aircraft space. Unlike the obese individual who in most cases is such by choice, the blind person has no choice in their dog's size. The matching of person and dog is an intense process specifically directed to the person's needs. It would be incongruous and unethical to consider a dog of a different size solely to accommodate airline requirements.

We suggest that you seek accommodation in an alternate manner. Wording such as the following proposed by Ed Eames, President of the International Association of Assistance Partners would seem appropriate.

"You may offer the passenger sitting in a seat adjacent to the disabled passenger traveling with a large service animal a seat in the same class of service in another part of the cabin. If no seats are available in that class of service, you may ask for a volunteer willing to occupy the seat next to the disabled passenger requiring sharing of leg room. If no volunteer is forthcoming and seats are available in another class of service, you may ask the adjacent passenger or the disabled passenger to occupy a seat in that other class of service."




...to enhance the lives of blind and visually impaired individuals.



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We ask that you review this proposed policy change and retain the policy that airlines have followed for many years. It will preserve access rights, provide an equitable solution and not impose a ludicrous and unconscionable financial penalty on disabled individuals.

Submitted by:



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President & CEO
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